

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

Filed  
RECEIVED  
02 JUL 18 AM 9:30  
U.S. BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

IN RE: ) Chapter 13  
 ) Case No. 99-09195-W  
Judith A. Graham, )  
 )  
 )  
 )  
 )  
 )

TO: All Creditors and Parties in Interest

**MOTION AND MEMORANDUM IN SUPPORT OF MOTION TO SELL PROPERTY**

YOU ARE HEREBY NOTIFIED that the Debtor proposes to sell the property herein described:

TYPE OF SALE: Private

PROPERTY TO BE SOLD: 1.86 acres with house located at 865 Old Mill Road,  
Campobello, SC 29322-8553

PRICE: \$200,000.00

APPRAISAL VALUE: \$193,020.00

BUYER: Ed and Karen Walcher  
\_\_\_\_\_  
\_\_\_\_\_

PLACE AND TIME OF SALE: Closing possible for August 31, 2002, or earlier, contingent  
upon Order from Bankruptcy Court

SALES AGENT: Diane Howard, realtor representing both parties

COMPENSATION TO SALES AGENT/AUCTIONEER/BROKER/ETC: \$12,000.00

ESTIMATED TRUSTEE'S COMPENSATION: unknown

LIENS/MORTGAGES/SECURITY INTERESTS ENCUMBERING PROPERTY: \$107,000.00

COSTS OF CLOSING: unknown at this time

DEBTORS' EXEMPTION: None

PROCEEDS ESTIMATED TO BE PAID TO ESTATE: Net proceeds from sale of property to pay off chapter 13 in full

Any party objecting to the sale must do so in writing and in accordance with SC LBR 9014-1; any such objections will be heard at the date, time, and place set forth in the Notice of Motion/Application and Opportunity for Hearing attached hereto. All objections should be filed with the Clerk of Court at 1100 Laurel Street, Post Office Box 1448, Columbia, SC 29202, with a copy served on the attorney of record, the trustee, or the debtor in possession, as applicable, at the address shown below. A copy of such objection should also be served on the United States Trustee of 1201 Main Street, Suite 2440, Columbia, SC 29201.

The court may consider additional offers at the scheduled hearing. The court may order at this hearing that the property be sold to another party on equivalent or more favorable terms.

The trustee or debtor in possession, as applicable, may seek sanctions or other similar relief against any party filing a spurious objection to this notice.



Gina R. McMaster  
Attorney for Debtor(s)  
8 Williams Street  
Greenville, SC 29601  
(864)232-1550  
District Court ID# 6714

7/17, 2002  
Greenville, South Carolina